

PUBLIC COMMENT FOR HRIW PART B PERMIT PUBLIC HEARING  
PRESENTED BY STEVEN KEITER, HRIW FACILITY MANAGER  
5 October 1994

Hello, my name is Steve Keiter. I am the Facility Manager for the Hydrocarbon Recycler's Inc. facility that is the subject of this permit. I was born and raised here in Wichita, and am now raising my own family here. I have been employed at HRIW for 6 years, first as the Laboratory Manager and then as the Facility Manager. When I first came to this facility, HRIW was a small, family owned business. Now we are owned by USPCI, a major commercial hazardous waste company.

HRIW provides a number of services to the community and to other industries. We process hazardous wastes and non-hazardous wastes for recycling. We provide a controlled and safe location for temporary storage and accumulation of wastes. Since 1990, we have worked with the city and county to handle household hazardous wastes from all over this area. We treat wastes to make them less hazardous or to make them usable as fuels. And we have specially trained employees who can go to a customer's site to help solve environmental problems.

Over the past several years we have provided a lot of information to the KDHE and to the U.S. EPA regarding the units, services, and operations at our site. We have responded to many questions from agency personnel to provide details and specific information about our operation. The agencies have used this information to develop a permit that we believe protects the environment and allows us to continue to provide services to the community and to local industries.

There are a few permit conditions that we feel need to be clarified or slightly modified to allow us to continue to serve our customers and provide the same high quality service they are accustomed to. I want to present a few of our comments here tonight; we will also be submitting a formal written set of comments before the end of the comment period.



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First, a simple comment. The Fact Sheet and the Permit refer to four container management units in Building I. Originally, Building I was proposed with four container management units, but in fact, now Building I has three container management units, as approved by KDHE.

Our most significant comment concerns the ability to process wastes at the facility. Permit condition V.F specifies that HRIW is not allowed to place ignitable or reactive wastes in any of the Subpart X units, which are waste processing units. We use these units to process waste for recycling as fuels, and to prepare drums for metals recycling and recovery.

The Subpart X units are the cornerstone of HRIW's fuels program. They have been used since they were installed for the processing of ignitable and non-ignitable, reactive and non-reactive wastes. They were designed and installed to industry standards, and operating procedures are in place to prevent any unplanned reactions, ignition, or releases. We have prepared a written comment requesting that this permit condition be changed to allow us to continue to process ignitable and reactive wastes in the Subpart X units. That comment includes a discussion of the procedures that are taken at HRIW to ensure safe operation of these units.

In Section VII, the corrective action portion of the permit, we have noticed that some of the Solid Waste Management Units overlap each other. In particular, the Dry Solids Gondola and the Open Area Along Southwest Corner both fall within the area identified as Area South of Building C. We are concerned about the duplication of effort that might result from this overlap, and have prepared a written comment asking that the three units be combined into a single solid waste management unit. Also, the solid waste management unit called the Warm Room was clean closed in 1992. The certification of clean closure was accepted by the KDHE. We are requesting that this unit be removed from the list of solid waste

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management units.

The RCRA Facility Assessment referenced in the permit is still a contractor's draft document, and as such contains some errors and inaccurate information. HRIW will be submitting a written comment requesting the opportunity to comment on the Draft RFA before it becomes a final document. In the event that the RFI Workplan is requested before the Draft RFA goes final, HRIW reserves the right to provide accurate and correct information in place of any faulty information that may be in the Draft RFA.

Permit condition VII.10 includes a statement requiring HRIW to comply with proposed and final financial assurance regulations. We have every intention of complying with any financial assurance requirements that have been promulgated as final regulations. However, proposed regulations are subject to change before promulgation and cannot be enforced. We are preparing a written comment requesting that this permit condition be revised to remove reference to proposed regulations.

I will be providing you with the text of tonight's comments. We will also be submitting a written document addressing all our comments on the draft permit. This document will include all of the comments I've discussed tonight, plus a number of other comments, such as clarifications and language changes.

I will be happy to answer any questions you may have regarding our comments or anyone else's. I am available at the HRIW facility every work day at 316-268-7500. Thank you for the opportunity to present our comments on this draft permit.